

# **EXHIBIT 2**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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LISA CARLSON	:	CIVIL ACTION
	:	
	:	
<i>Plaintiff,</i>	:	
v.	:	
	:	
QUALTEK WIRELESS, LLC	:	NO. 2:22-CV-00125
	:	
<i>Defendant.</i>	:	JURY TRIAL DEMANDED
	:	

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**DEFENDANT, QUALTEK WIRELESS, LLC'S EXHIBIT LIST**

Defendant, QualTek Wireless, LLC (“QW”), by and through its undersigned counsel, respectfully submit the following exhibit list pursuant to this Court’s Scheduling Order dated March 29, 2022 [Doc. No. 18]<sup>1</sup>:

<b>EXHIBITS THAT DEFENDANT EXPECTS TO OFFER AT TRIAL</b>			
<b>EX. NO.</b>	<b>DATE</b>	<b>BATES NO./DOC IDENTIFIER (where applicable)</b>	<b>DESCRIPTION</b>
D001	3/27/22	ECF No. 12	Plaintiff’s First Amended Complaint
D002	4/15/20	CARSLON DISCOVERY 000030–000034	EEOC Charge of Discrimination with Addendum
D003	8/16/21	CARSLON DISCOVERY 000001–000002	EEOC Determination
D004	3/2/20	CARSLON DISCOVERY 000024–000034	Director of Finance in King of Prussia, PA at Qualtek, Job Posting and Description
D005	July 2019	Qualtek00185-Qualtek00186	Empire Telecom, LLC Director of Finance Job Description
D006	Undated	Qualtek00439-Qualtek00442	Director Degree List 2017–2020
D007	11/19/17	Qualtek00221-Qualtek00222	Employment Offer Letter to Plaintiff
D008	Undated	Qualtek00193-Qualtek00194	Plaintiff’s Resume

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<sup>1</sup> Due to QW’s pending motion for summary judgment that may impact the issues at trial, QW reserves the right to supplement this list.

<b>EXHIBITS THAT DEFENDANT EXPECTS TO OFFER AT TRIAL</b>			
<b><u>EX. NO.</u></b>	<b><u>DATE</u></b>	<b><u>BATES NO./DOC IDENTIFIER (where applicable)</u></b>	<b><u>DESCRIPTION</u></b>
D009	3/30/18	Qualtek00238	Revised Offer Letter of Employment to Plaintiff
D010	1/29/18	Qualtek00391-Qualtek00415	Relevant Portions of B. Neff's Personnel File
D011	6/30/22	Qualtek00417-Qualtek00418	Salary Timeline Records for Plaintiff and B. Neff
D012	9/11/19	Qualtek00368-Qualtek 00390	Relevant Portions of B. Ebeling's Personnel File
D013	12/3/19	Qualtek00188-Qualtek 00192	Email string with Plaintiff and M. Web re: Application – Director of Finance
D014	1/24/20	Qualtek00199	Meeting Summary of Human Resources Discussion with Plaintiff
D015	1/31/20	Qualtek00205-Qualtek00206	D. Conn email re: Wireless Corporate Restructure
D016	2/13/20	Qualtek00240-Qualtek00246	Collection of Emails re: King of Prussia
D017	1/27/20	Qualtek00197-Qualtek00198	Email string with S. Trybula, Plaintiff, D. Conn and S. Kemmerer re: Bonus Issue
D018	4/1/18	Qualtek00416	Personnel Action Notice (PAN) for Plaintiff submitted by J. Busky
D019	1/31/20	Qualtek00210-Qualtek00214	Plaintiff's Severance Agreement and General Release
D020	Jan. 2019	Qualtek00001-Qualtek00160	Qualtek Employee Handbook
D021	6/30/20	Qualtek00173-Qualtek00177	Chart of Salaries and Bonuses for Finance Employees
D022	2/12/20	Qualtek00215	Plaintiff's Termination Report
D023	12/1/17	Qualtek00217-Qualtek00239	Plaintiff's Personnel File
D024	7/12/22	ECF No. 27-4 at 457–462	Relevant Portions of QualTek Website
D025	2018	Qualtek00419-Qualtek00432	Plaintiff's 2018 Performance Reviews
D026	1/12/20	Qualtek00433-Qualtek00438	Plaintiff's 2019 Performance Review

**FOX ROTHSCHILD LLP**

By: /s/ Colin D. Dougherty

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Dated: July 28, 2022

*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I, COLIN D. DOUGHERTY, hereby certify that, on this date, I served the foregoing document upon Plaintiff's counsel via electronic mail.

Dated: July 28, 2022

By: */s/ Colin D. Dougherty*  
COLIN D. DOUGHERTY